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*Counsel for Plaintiff Jaysen Stevenson*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

JEFFREY EDELMAN, Derivatively on Behalf  
of CAREDX, INC.,

Plaintiff,

v.

MICHAEL D. GOLDBERG, REGINALD  
SEETO, GEORGE BICKERSTAFF, FRED  
COHEN, GRACE E. COLON, CHRISTINE  
COURNOYER, WILLIAM HAGSTROM,  
PETER MAAG, RALPH SNYDERMAN,  
ARTHUR TORRES, HANNAH VALANTINE,  
AND ANKUR DHINGRA,

Defendants,

and

CAREDX, INC.,

Nominal Defendant.

Case No.: 3:22-cv-05379-TLT

**STIPULATION AND ~~PROPOSED~~  
ORDER CONSOLIDATING  
RELATED ACTIONS, APPOINTING  
CO-LEAD COUNSEL, AND  
STAYING CONSOLIDATED  
ACTION**

[Caption continued on next page]

JAYSEN STEVENSON, derivatively on behalf  
of CAREDX, INC.,

Plaintiff,

v.

GEORGE BICKERSTAFF, FRED COHEN,  
CHRISTINE COURNOYER, GRACE E.  
COLÓN, ANKUR DHINGRA, MICHAEL D.  
GOLDBERG, WILLIAM HAGSTROM,  
PETER MAAG, REGINALD SEETO, RALPH  
SNYDERMAN and HANNAH VALANTINE,

Defendants,

and

CAREDX, INC.,

Nominal Defendant.

Case No.: 3:23-cv-00557-TLT

1 WHEREAS, on September 21, 2022, Plaintiff Jeffrey Edelman (“Edelman”) filed a  
 2 shareholder derivative complaint on behalf of CareDx, Inc. (“CareDx” or the “Company”) in this  
 3 Court alleging breach of fiduciary duties, unjust enrichment, and violations of Section 14(a) and  
 4 20(a) of the Securities Exchange Act of 1934 (the “Exchange Act”) against defendants Michael D.  
 5 Goldberg, Reginald Seeto, George Bickerstaff, Fred Cohen, Grace E. Colon, Christine Cournoyer,  
 6 William Hagstrom, Peter Maag, Ralph Snyderman, Arthur Torres, Hannah Valantine, and Ankur  
 7 Dhingra (the “Individual Defendants” and with CareDx, “Defendants”) and insider trading against  
 8 Goldberg, Seeto, Bickerstaff, Colon, Hagstrom, Maag, and Snyderman, captioned *Edelman v.*  
 9 *Goldberg, et al.*, Case No. 3:22-cv-05379-TLT (“*Edelman Action*”);

10 WHEREAS, on December 8, 2022, the Court entered the Joint Stipulation and Order  
 11 Regarding Stay of Action (“Stay Order”) in the *Edelman Action* (ECF No. 20) which, *inter alia*,  
 12 stayed the *Edelman Action* pending the disposition of a motion to dismiss in the related securities  
 13 class action, *Plumbers & Pipefitters Local Union #295 Pension Fund v. CareDx, Inc. et al*, Case  
 14 No. 22-cv-03023-TLT (“Securities Class Action”);

15 WHEREAS, on February 7, 2023, Plaintiff Jaysen Stevenson filed his shareholder  
 16 derivative complaint on behalf of CareDx alleging the same claims against the Individual  
 17 Defendants except Arthur Torres, captioned *Stevenson v. Bickerstaff, et al.*, Case No. 3:23-cv-  
 18 00557-TLT (“*Stevenson Action*” and with the *Edelman Action*, the “Derivative Actions”);

19 WHEREAS, on February 10, 2023, Plaintiff Stevenson filed an administrative motion to  
 20 relate the *Stevenson Action* to the *Edelman Action*. On February 16, 2023, the *Stevenson Action*  
 21 was deemed related to the *Edelman Action* and reassigned to Judge Trina L. Thompson;

22 WHEREAS, under Fed. R. Civ. P. 42(a), when actions involve “a common question of law  
 23 or fact,” the Court may “(1) join for hearing or trial any or all matters at issue in the actions; (2)  
 24 consolidate the actions; or (3) issue any other orders to avoid unnecessary cost or delay”;

25 WHEREAS, Plaintiffs Edelman and Stevenson (“Plaintiffs”) and Defendants (collectively,  
 26 the “Parties”) in the Derivative Actions agree that the related Derivative Actions challenge  
 27 substantially similar alleged conduct by the same Company directors and officers and involve many  
 28 of the same questions of law and fact, and that the administration of justice would best be served

1 by consolidating the Derivative Actions;

2 WHEREAS, in order to realize the efficiencies made possible by consolidation of the  
3 Derivative Actions, Plaintiffs agree that Levi & Korsinsky, LLP and The Rosen Law Firm, P.A.,  
4 the respective resumes of which are attached hereto as Exhibits A and B, shall be designated as Co-  
5 Lead Counsel representing Plaintiffs in the consolidated action;

6 WHEREAS, Defendants do not oppose the appointment of Co-Lead Counsel; and

7 WHEREAS, this stipulation is not a waiver of any of the Parties' rights, remedies, claims  
8 or defenses;

9 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, and upon approval  
10 and entry by the Court shall be ORDERED, as follows:

11 1. The Stay Order entered in the *Edelman* Action on December 8, 2022 is temporarily  
12 lifted for the limited purpose of the filing of, and ruling on, this Stipulation and [Proposed] Order.

13 2. Defendants hereby accept service of the complaint filed in the *Stevenson* Action.

14 3. The Derivative Actions are hereby consolidated for all purposes, including pretrial  
15 proceedings, trial, and appeal, and are referred to herein as the "Consolidated Action."

16 4. Every pleading filed in the Consolidated Action, or in any separate action included  
17 herein, shall bear the following caption:

18 **UNITED STATES DISTRICT COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**

20 IN RE CAREDX, INC. DERIVATIVE  
21 LITIGATION

Lead Case No. 3:22-cv-05379-TLT

22  
23 This Document Relates to:

24 ALL ACTIONS

25 5. The file in *Edelman v. Goldberg, et al.*, Case No. 3:22-cv-05379-TLT, shall  
26 constitute the Master File for every action in the Consolidated Action. When the document being  
27 filed pertains to all Actions, the phrase "This Documents Relates to All Actions" shall be placed  
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1 on the cover page. When a pleading applies only to some, but not all, of the Actions, the document  
2 shall list on the cover page the phrase “This Document Relates To:”, the docket number for each  
3 individual action to which the document applies, along with the last name of the first-listed plaintiff  
4 in said action.

5 6. Co-Lead Counsel for Plaintiffs for the conduct of the Consolidated Action shall be:

6  
7 **LEVI & KORSINSKY, LLP**

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21 7. Plaintiffs’ Co-Lead Counsel shall have the sole authority to speak for plaintiffs in  
22 all matters regarding pre-trial procedure, trial, and settlement negotiations and shall make all work  
23 assignments in such manner as to facilitate the orderly and efficient prosecution of this litigation  
24 and to avoid duplicative or unproductive effort.

25 8. Co-Lead Counsel shall be responsible for coordinating all activities and appearances  
26 on behalf of plaintiffs. No motion, request for discovery, or other pre-trial or trial proceedings will  
27 be initiated or filed by any plaintiffs except through Co-Lead Counsel.

28 9. Defendants’ counsel may rely upon all agreements made with counsel of record

1 from either Co-Lead Counsel, or other duly authorized representatives of Co-Lead Counsel, and  
2 such agreements shall be binding on all plaintiffs.

3 10. This order shall apply to each shareholder derivative action arising out of the same,  
4 or substantially the same, transactions or events as these cases, which is subsequently filed in,  
5 removed to, reassigned to, or transferred to this Court. When a shareholder derivative action that  
6 properly belongs as part of *In re CareDx, Inc. Derivative Litigation*, Lead Case No. 3:22-cv-05379-  
7 TLT, is hereafter filed in the Court, removed to this Court, reassigned to the Court, or transferred  
8 here from another court, this Court requests the assistance of counsel in calling to the attention of  
9 the clerk of the Court the filing, removal, reassignment, or transfer of any case that might properly  
10 be consolidated as part of *In re CareDx, Inc. Derivative Litigation*, Lead Case No. 3:22-cv-05379-  
11 TLT, and counsel are to assist in assuring that counsel in subsequent actions receive notice of this  
12 Order. Unless otherwise ordered, the terms of all orders, rulings, and decisions in the Consolidated  
13 Action shall apply to all later substantially similar shareholder derivative actions filed in this Court,  
14 removed to this Court, reassigned to the Court, or transferred here from another court.

15 11. This Order is without prejudice to any and all defenses Defendants may assert,  
16 except for sufficiency of service of process, in this or any of the above-referenced actions and  
17 without prejudice to any and all claims Plaintiffs may assert.

18 12. The terms of the Stay Order entered in the *Edelman* Action on December 8, 2022  
19 staying the *Edelman* Action shall apply to the Consolidated Action.  
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1           **IT IS SO STIPULATED.**

2       Dated: March 7, 2023

3           **LEVI & KORSINSKY, LLP**

4           **WILLKIE FARR & GALLAGHER LLP**

5       By: /s/ Daniel Tepper

5       By: /s/ Laura Leigh Geist

6       Adam Apton (SBN 316506)  
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13      **LEVI & KORSINSKY, LLP**

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13      Tariq Mundiya (*pro hac vice* forthcoming)  
14      Charles Cording (*pro hac vice*  
15      forthcoming)  
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23      *Counsel for Plaintiff Jeffrey Edelman*

23      *Counsel for Nominal Defendant CareDx, Inc.  
24      and on behalf of the Individual Defendants*

25      **THE ROSEN LAW FIRM, P.A.**

26      By: /s/ Laurence M. Rosen

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33      *Counsel for Plaintiff Jaysen Stevenson*

**Attestation Pursuant to Local Rule 5-1(h)(3)**

Pursuant to Local Rule 5-1(h)(3), I attest that concurrence in the filing of this document has been obtained from each of the other signatories.

Dated: March 7, 2023

/s/ Laurence M. Rosen

\* \* \*

**~~PROPOSED~~ ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: March 9, 2023



Hon. Trina L. Thompson  
United States District Judge